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February 13, 2012

The Honorable Jocelyn Boyd
Chief Clerk of the Commission
Public Service Commission of South Carolina
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: AT&T South Carolina's Petition Requesting the Commission's
Intervention in Numbering Resources Determinations –
Columbia Rate Center – Lexington Medical Center
Docket No.

Dear Ms. Boyd:

BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T South Carolina") respectfully encloses for filing a Petition for Review of Numbering Resources Determination in the Columbia Rate Center in the above-captioned matter.

By copy of this letter, I am serving a copy of this document on all parties of record as indicated on the attached Certificate of Service.

Sincerely,

A handwritten signature in black ink that reads "Patrick W. Turner". The signature is written in a cursive, flowing style.

Patrick W. Turner

PWT/nml
Attachment
963867

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA

In Re: AT&T SOUTH CAROLINA’S)
PETITION REQUESTING THE COMMISSION’S)
INTERVENTION IN NUMBERING RESOURCES)
DETERMINATIONS)
_____)

PETITION FOR REVIEW OF NUMBERING RESOURCES DETERMINATION
IN THE COLUMBIA RATE CENTER

BellSouth Telecommunications, Inc. d/b/a AT&T South Carolina (“AT&T South Carolina”), pursuant to rules adopted by the Federal Communications Commission (“FCC”) for challenging numbering determinations, petitions the Public Service Commission of South Carolina (“Commission”) for review of a recent denial of AT&T South Carolina’s application for use of numbering resources in the 803 area code. Numbering determinations are made by the North American Numbering Plan Administrator (“NANPA”) and/or the Pooling Administrator (“PA”), depending on the nature of the numbering request. The FCC’s rules addressing these matters, however, generalize responsibilities of the NANPA and the PA under the heading “Central office code administration,”¹ and the FCC’s Orders addressing these matters allow for challenges of determinations by both entities.² Accordingly, this Petition addresses the determination described herein and asks the Commission to direct NANPA and/or the PA to provide the requested relief to the extent it is within the respective authority and responsibility of

¹ See, e.g., 47 C.F.R. §52.15.

² See Third Report and Order and Second Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, *Numbering Resource Optimization; etc.*, 17 FCC Rcd 252, ¶61 (2001) (“*Third NRO Order*”).

NANPA and/or the PA to do so. The denial that is the subject of this Petition impacts AT&T South Carolina customer Lexington Medical Center.

In support of this Petition, AT&T South Carolina states:

1. AT&T South Carolina is a telephone utility that provides, among other things, intraLATA, local exchange telecommunications services in various portions of South Carolina, including the Columbia exchange.

2. NANPA is an independent non-governmental entity that is responsible for administering and managing the North American Numbering Plan (“NANP”).³

3. The PA is an independent non-governmental entity that is responsible for administering thousands-block number pooling.⁴

4. On March 31, 2000, the FCC issued an Order relating to numbering resource optimization.⁵ The goal of the *First NRO Order* was to implement uniform standards governing requests for telephone numbering resources in order to increase efficiency in the use of existing telephone numbers and to avoid further exhaustion of existing numbers.

5. Among other things, the FCC required that, to qualify for access to new numbering resources, applicants must establish that existing inventory within the applicant’s rate center will be exhausted within six months of the application. The FCC reaffirmed this

³ See 47 C.F.R. § 52.13 (a), (b).

⁴ See 47 C.F.R. §52.7(g). See also 47 C.F.R. §52.20 (“Thousands-block number pooling is the process by which the 10,000 numbers in a central office code (NXX) are separated into ten sequential blocks of 1,000 numbers each (thousands-blocks), and allocated separately within a rate center.”).

⁵ See Report and Order and Further Notice of Proposed Rule Making, *Numbering Resources Optimization*, 15 FCC Rcd 7574 (2000) (“*First NRO Order*”).

requirement in two subsequent orders.⁶ Prior to this ruling, the Central Office Code Assignment Guidelines used to make code assignments required the applicant's existing number inventory within the applicant's serving switch to exhaust within six months of the code application or the carrier had to prove that it was unable to meet a specific customer's request with its current inventory of numbers in order for a code to be assigned.

6. In addition to the months-to-exhaust ("MTE") requirement described above, the FCC's rules also required carriers to meet a rate center utilization threshold of 60 percent in order to receive additional numbering resources in a given rate center.⁷ The utilization threshold has increased by five percent per year, and it has now reached the maximum of 75 percent. Based on the FCC's orders, carriers must meet both the six months MTE requirement and the utilization threshold on a rate center basis in order to obtain numbering resources.⁸

7. On or about January 18, 2012, AT&T South Carolina submitted a Pooling Administration System request for the assignment of one thousand-block in the Columbia exchange for its customer's growth. In order to meet the customer's express request for numbers,⁹

⁶ See Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, *Numbering Resource Optimization*, 16 FCC Rcd 306 at ¶29 (2000) ("*Second NRO Order*"); *Third NRO Order* at ¶¶48-49.

⁷ See *Second NRO Order* at ¶22; *Third NRO Order* at ¶¶50-52.

⁸ *Third NRO Order* at ¶¶50-52.

⁹ See Exhibit A to this Petition.

AT&T South Carolina requested the assignment of one thousand-block in the 803 NPA, specifically 803-935-8XXX.¹⁰ As AT&T South Carolina does not have the existing numbers to meet the customer's request, AT&T South Carolina is requesting that the numbers be assigned to it.

8. AT&T South Carolina's application was completed in accordance with Industry Numbering Committee ("INC") guidelines, and AT&T South Carolina filled out the necessary Month-to-Exhaust Certification Worksheets as required.

9. At the time of the filing of the numbering resource request, the Columbia Rate Center had a MTE of 534.249 months for the relevant block, and a utilization of 64.228%.¹¹

10. Thereafter, also on January 18, 2012, AT&T South Carolina's request was denied because AT&T South Carolina had not met the MTE and/or Utilization criterion now set forth in the INC Guidelines.¹² AT&T South Carolina's numbering resource requests were denied despite the fact that AT&T South Carolina does not have adequate numbering resources needed to satisfy this customer's demands in the Columbia Rate Center.

11. AT&T South Carolina's inability to provide this important customer with the requested numbering resources prevents AT&T South Carolina from providing the quality of service this customer desires, needs, and expects. If AT&T South Carolina is not assigned the numbering resources needed to meet the customer's request, AT&T South Carolina will be unable to provide telecommunications services requested by its customer. The refusal to grant numbering resources sufficient to meet the needs of this customer is inconsistent with the FCC's

¹⁰ See Exhibit B to this Petition.

¹¹ See *Id.*

¹² See *Id.*

position that “(u)nder no circumstances should consumers be precluded from receiving telecommunications services of their choice from providers of their choice for want of numbering resources.”¹³

12. Both the FCC’s rules and the INC Guidelines provide that state regulatory authorities have the power and authority to review a decision to deny a request for numbering resources.¹⁴

13. Prior to the FCC’s Order and the resulting change in the INC Guidelines, the applicable MTE procedures permitted a carrier to receive a code assignment, even if the MTE requirement at the switch level was not met. These waivers or exceptions were granted where customer hardships could be demonstrated or where the service provider’s inventory did not have a block of sequential numbers large enough to meet the customer’s specific request. Under today’s procedures, numbering determinations are based on the MTE for the entire rate center without any exceptions. The FCC has determined, however, that States may grant relief “if a carrier demonstrates that it has received a customer request for numbering resources in a given rate center that it cannot meet with its current inventory.”¹⁵ In addition, the FCC has ruled that, “States...may grant requests for customers seeking contiguous block of numbers.”¹⁶

¹³ *Second NRO Order* at ¶ 61.

¹⁴ See *Third NRO Order*, Appendix A, Final Rules, § 52.15(g) (4) (“The carrier may challenge the NANPA’s decision to the appropriate state regulatory commission”); *Third NRO Order* at ¶¶ 61-66; *Central Office Code (NXX) Assignment Guidelines*, INC 95-407-009, § 13.0 (rev. April 26, 1999)(CO Code Guidelines) (“Appeals may include but are not limited to one or more of the following options: . . . C. The CO Code Administrator(s) and code holders/applicants may pursue the disagreement with the appropriate governmental/regulatory body”).

¹⁵ *Third NRO Order* at ¶ 64.

¹⁶ *Id.*

14. AT&T South Carolina requests that the Commission reverse the decision to withhold numbering resources from AT&T South Carolina because that decision interferes with AT&T South Carolina's ability to provide telecommunication services to its customers as required under South Carolina law.

15. This Commission (see Docket No. 2002 -185-C, Order No. 2002-415) and other state regulatory agencies in Alabama, Florida, Georgia, Louisiana, North Carolina, and Tennessee similarly have recognized their jurisdiction and authority to review numbering denials and to order the release of number resources to AT&T South Carolina to meet customer needs.

WHEREFORE, AT&T South Carolina requests that the Commission:

- A. Reverse the decision to deny AT&T South Carolina's request for additional numbering resources;
- B. Direct NANPA and/or the PA (to the extent it is within the respective authority and responsibility of NANPA and/or the PA to do so) to provide one thousand-block in the 803 NPA, specifically 803-935-8XXX; and
- C. Grant the requested relief as soon as possible.

Respectfully submitted this 13th day of February 13, 2012.



Patrick W. Turner
Suite 5200
1600 Williams Street
Columbia, South Carolina 29201
(803) 401-2900

ATTORNEY FOR AT&T SOUTH CAROLINA

EXHIBIT A



**LEXINGTON
MEDICAL CENTER**

Your partner for health and wellness™

2720 Sunset Boulevard
West Columbia, SC 29169
803-791-2000

January 9, 2012

Attn: Mr. Michael Dempsey

Re: Telecom Number Range Request

Dear Mr. Dempsey,

Lexington Medical Center has seen record growth in 2011, and is continuing to expand in 2012. We currently have over 5000 employees and the new physician practices that are projected to become part of our network of care will add significantly to this number. We are rapidly approaching the point at which we are going to be completely out of telecom numbers that we can assign to new practices. In order to be able to quickly acquire these new business units we need to have an adequate supply of numbers available for that purpose. Lexington Medical Center would like to formally request a new range of 1000 numbers.

The challenge for us is to be able to find number ranges that have not already been used in our system already. We have conducted surveys of our current numbers and have discovered that we would have the least amount of number duplication in the 8000 – 8999 range. Will you submit this request on our behalf for new numbers in the above mentioned range, so that we can continue to provide service to our business units and also meet the healthcare needs of our community?

Sincerely,

Billy S. Griggs
Senior Telecom Technician
Lexington Medical Center

EXHIBIT B

Pooling Administration System	
MARTA.ANTELO@ATT.COM (SP)	• Sign Out
Time : 01/18/2012 11:11:42 AM EST	
Printable Version	
TBPAG Attachment 1 - March 19, 2007	
Thousands-Block Application Form - Part 1A	
Tracking Number:	803- COLUMBIA- SC-510217 Individual Block Request
Type of Application:	<input checked="" type="checkbox"/> New <input type="checkbox"/> Change <input type="checkbox"/> Disconnect
GENERAL APPLICATION INFORMATION	
1.1 Contact Information:	
Block Applicant:	
Company Name:	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL
Headquarters Address:	2600 CAMINO RAMON
City, State, Zip:	SAN RAMON, CA, 94583
Contact Name:	MARTA ANTELO
Contact Address:	600 NW 79TH AVENUE, ROOM 336
City, State, Zip:	MIAMI, FL, 33126
Phone: 305- 260-8213	FAX: 305- 264-2918 E-mail: MARTA.ANTELO@ATT.COM
Pooling Administrator: ⁱⁱ	
Contact Name:	John Auerbach
Contact Address:	1800 Sutter St. Ste. 780
City, State, Zip:	Concord, CA, 94520
Phone: 925-363-8706	FAX: 925-363-7684
E-mail: john.auerbach@neustar.biz	
1.2 General Information:	
Check one : No LRN needed <input checked="" type="checkbox"/> LRN needed ⁱⁱⁱ _____	
NPA: 803 LATA: 434 OCN: ^{iv} 9417 Parent Company's OCN 9400	

Number of Thousands-Blocks Requested : 1

Switching Identification(Switch Entity/POI) : ^v
CLMASCSW79E

City or Wire Center Name : _____ Rate Center: ^{vi} COLUMBIA
Rate Center Sub Zone: _____

1.3 Dates:

Date of Application: ^{vii} 01/18/2012 Requested Block Effective Date: ^{viii}
02/18/2012

☐ By selecting this checkbox, I acknowledge that I am requesting the earliest possible effective date the Administrator can grant. Please note that this only applies to a reduction in the Administrator's processing time, however the request will still be processed in the order received.

Request Expedited Treatment? (See Section 8.6) Yes _____ No X

1.4 Type of Service Provider Requesting the Thousands-Block :

- a) Type of Service Provider : Incumbent Local Exchange Carrier (ILEC)
(LEC, IXC, CMRS, Other)
- b) Primary type of service Blocks to be used for : Wireless Type 2
- c) Thousands-Block(s) (NXX-X) assignment Preference (Optional)
REQUESTING 1 BLOCK IN NPA 803 AND IN THE POOL LIST BLOCK 803-935-8 IS AVAILABLE AND NON-CONTAMINATED.
- d) Thousands-Block(s) (NXX-X) that are undesirable for this assignment , if any
NPA-NXX-0,1,2,3,4,5,6,7,9
- e) If requesting a code for LRN purposes, indicate which block(s) you will be keeping(the remainder of the blocks will be given to the pool) _____

1.5 Type of Request:

Initial block for rate center : Yes _____ If Yes , attach evidence of authorization and proof of capability to provide service within 60 days.

Growth block for rate center : Yes X If Yes , attach months to exhaust worksheet

☐ By selecting this checkbox, I acknowledge that I am willing to accept a block in red and explicitly understand that the underlying CO code may not yet be activated in the PSTN and loaded in the NPAC on the block effective date.

Type of change(Mark **all** that apply)

☐ OCN:Intra-company ^{ix} ☐ Switching Id ☐ Part 1B

☐ OCN:Inter-company ^x ☐ Effective Date

Change block : Yes _____ If Yes , list NPA-NXX-X _____

1.6 Block Return :

- a) Is this block Contaminated Yes _____ No _____
- b) If Yes how many TNs are NOT available for assignment : _____
- c) Have all new Intra SP ports been completed in the NPAC Yes _____ No _____
- d) Has this block been protected from further assignment Yes _____ No _____

Disconnect block : Yes _____ If Yes , list NPA-NXX-X _____

Remarks: **REQUESTING 1 BLOCK IN NPA 803 AND IN THE POOL LIST BLOCK 803-935-8 IS AVAILABLE AND NON-CONTAMINATED.**

I hereby certify that the above information requesting an NXX-X block is true and accurate to the best of my knowledge and that this application has been prepared in accordance with the Thousands-Block (NXX-X) Pooling Administration Guidelines(ATIS-0300066) available on the ATIS web site (<http://www.atis.org/inc>) or by contacting inc@atis.org as of the date of this application.

MARTA ANTELO

**ASSOC
TECH
SUPPORT 01/18/2012
ANLYS
NTWK**

Signature of Block Applicant _____

Title _____ Date _____

Instructions for filling out each Section of the Part 1A form:

Section 1.1 Contact information requires that Service Providers supply under "Block Applicant" the company name, company headquarters address, a contact within the company, an address where the contact person may be reached, in addition to the correct phone, fax, and e-mail address. The Pooling Administrator section also requires the Service Provider to fill in the Pooling Administrator's name, address, phone, fax and e-mail.

Section 1.2 Service Providers who need a thousands-block assignment or for an Location Routing Number (LRN) are required to fill in this section. If needed for an LRN, a CO Code Application needs to also be submitted to the PA. The Service Provider should supply the Numbering Plan Area (NPA); the Local Access Transport Area (LATA), which is a three-digit number that can be found in the TelcordiaTM LERGTM Routing Guide. The Operating Company Number (OCN) assigned to the service provider and the OCN its parent company. An OCN is a four-character alphanumeric assigned by TelcordiaTM Routing Administration (TRA). In addition, the number of thousands-blocks requested should be supplied. The Switch Identification as well as the city or wire center name, rate center, rate center sub zone, homing tandem and CLLITM tandem of the facilities based provider^{xi}. Explanations of these terms may be found in the footnotes.

Section 1.3 The date the Service Provider completes the application should be entered in this section, as well as the Effective Date of the requested thousands-block.

Section 1.4 Service Providers should indicate their type, e.g., local exchange carrier, competitive local exchange carrier, interexchange carrier, CMRS. They also indicate the primary type of business in which the numbering resource is to be used. Service Providers also may indicate their preference for a particular thousands-block, e.g., 321-9XXX, or indicate any thousands-blocks that may be undesirable, e.g., 321-6XXX.

Section 1.5 Service Providers indicate the type of request. Initial requests are for first applications for thousands-blocks in a rate center, growth for additional thousands-blocks in a rate center in which the applicant already has numbering resources, and provide the required evidence as ordered by the FCC.

Section 1.6 Service Providers must indicate the updated/current information in regards to contaminated TNs on the block they are returning to the pool. Blocks with over 10% contamination (101 TNs or more) shall not be returned to the pool unless they meet criteria outlined in section 9.1.2 of these Guidelines. If the block being returned is over 10% contaminated the PA shall seek a new block holder. If question

c and/or d have a response of No, the request for return shall be denied. The thousands-block applicant certifies veracity of this form by signing their name, and providing their title and date.


Foot Notes :

- ⁱ Identify the type of change(s) in Section 1.5.
- ⁱⁱ The Pool Administrator is available to assist in completing these forms.
- ⁱⁱⁱ A CO Code application will also need to be submitted to the PA.
- ^{iv} Operating Company Number (OCN) assignments must uniquely identify the applicant. Relative to CO Code assignments, NECA-assigned Company Codes may be used as OCNs. Companies with no prior CO Code or Company Code assignments should contact NECA (800 524-1020) to be assigned a Company Code (s). Since multiple OCNs and/or Company Codes may be associated with a given company, companies with prior assignments should direct questions regarding appropriate OCN usage to (TRA) (732-699-6700).
- ^v This is an eleven-character descriptor of the switch provided by the owning entity for the purpose of routing calls. This is the 11 character CLLI™ code of the switch /POI.
- ^{vi} Rate Center name must be a tariffed Rate Center.
- ^{vii} Acknowledgment and indication of disposition of this application will be provided to applicant within seven calendar days from the date of receipt of this application. An incomplete form may result in delays in processing this request.
- ^{viii} Please ensure that the NPA-NXX of the LRN to be associated with this block(s) is/will be active in the network prior to the effective date of the block(s).
- ^{ix} Select if you are the current Block Holder.
- ^x Select if you are not the current Block Holder
- ^{xi} Telcordia, LERG Routing Guide, and CLLI are trademarks of Telcordia Technologies, Inc.

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Pooling Administration System			
 MARTA.ANTELO@ATT.COM (SP)	• Sign Out		
Time : 01/18/2012 11:13:44 AM EST			
Printable Version			
November 21, 2003 ATIS-0300066.at3 Attachment 3			
Pooling Administrator's Response/Confirmation TBPAG Part 3			
Tracking Number :	803- COLUMBIA-SC- 510217		
Date of Application:	01/18/2012	Effective Date:	
Date of Receipt:	01/18/2012	Date of Response:	01/18/2012
Service Provider Name:	BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL		
(Telcordia TM LERG TM Routing Guide) OCN:	9417		
NPAC SOA SPID :			
Pooling Administrator Contact Information:			
John Auerbach	Phone:	925-363-8706	
Signature of Pooling Administrator			
John Auerbach	Fax:	925-363-7684	
Name (print)			
Email: john.auerbach@neustar.biz			
NPA-NXX or NPA-NXX-X :	Block Assigned: _____		
	Block Reserved : _____		
	Block Reservation Expiration Date : _____		
	Block/Code Modified : _____		
	Block/Code Disconnected : _____		
Block Contaminated(Yes or No) : _____			
If Yes,enter the number of TNs contaminated : _____			
Switch Identification(Switch Entity/POI):	1 CLMASCSW79E		
Rate Center:	COLUMBIA		
Rate Center Sub Zone:			

☒ **Form Complete, request denied.**

Explanation:

DR-57: You do not meet the MTE and/or Utilization requirements, therefore this request for a new block is denied. You may proceed with requesting a State Waiver from the appropriate state commission using this Part 3 denial. If you are in disagreement with the disposition of this request, please refer to the Thousands-Block Number (NXX-X) Pooling Administration Guidelines for the appeals process.

☐ **Request withdrawn.**

Explanation:

☐ **Assignment activity suspended by the administrator.**

Explanation:

Remarks:

¹ This is an eleven-character descriptor provided by the owning entity for the purpose of routing calls. This must be the CLLI TM Location Identification code of the switching entity/POI shown on the Part 1A form (Telcordia, LERG ROUTING Guide and CLLI are trademarks of Telcordia Technologies, Inc.)

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Pooling Administration System																																																			
MARTA.ANTELO@ATT.COM (SP)										• Sign Out																																									
Time : 01/18/2012 11:12:40 AM EST																																																			
<div style="display: flex; justify-content: space-between;"> <div> <p>Appendix 3</p> <p>MONTHS TO EXHAUST and UTILIZATION CERTIFICATION WORK SHEET - TN Level¹</p> <p>(Thousands-Block Number Pooling Growth Block Request)</p> <p>Tracking Number: 803-COLUMBIA-SC-510217</p> <p>Date: 01/18/2012 OCN:9417 Company Name:BELLSOUTH TELECOMM INC DBA SOUTHERN BELL TEL & TEL</p> <p>Rate Center: COLUMBIA</p> <p>List all Codes NPA(s)-NXX(s) and Blocks NPA(s)-NXX-X(s):</p> <p>Name of Block Applicant:MARTA ANTELO Signature: MARTA ANTELO</p> <p>Title:ASSOC TECH SUPPORT ANLYS NTWK Telephone No.: 305-260-8213</p> <p>FAX No.: 305-264-2918</p> <p>E-mail: MARTA.ANTELO@ATT.COM</p> <p>A. Available Numbers:196960</p> <p>B. Assigned Numbers: 442650</p> <p>C. Total Numbering Resources:689185</p> <p>D. Quantity of numbers activated in the past 90 days (increments of 1,000 or 10,000) and excluded from the Utilization calculation ²:0</p> <p>List Excluded Code(s) or Block(s):</p> <table style="width: 100%; border-collapse: collapse;"> <thead> <tr> <th></th> <th>Month #1</th> <th>Month #2</th> <th>Month #3</th> <th>Month #4</th> <th>Month #5</th> <th>Month #6</th> <th>Month #7</th> <th>Month #8</th> <th>Month #9</th> <th>Month #10</th> <th>Month #11</th> <th>Month #12</th> </tr> </thead> <tbody> <tr> <td>E. Growth History - Previous 6 months³</td> <td>1081</td> <td>249</td> <td>1328</td> <td>1769</td> <td>-3419</td> <td>204</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td></td> </tr> <tr> <td>F. Forecast - Next 12 months⁴</td> <td>202</td> <td>202</td> <td>202</td> <td>1202</td> <td>202</td> <td>202</td> <td>202</td> <td>202</td> <td>202</td> <td>202</td> <td>202</td> <td>202</td> </tr> </tbody> </table> </div> <div style="text-align: right; padding-top: 0;"> <p>Printable Version May 16, 2008</p> </div> </div>														Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12	E. Growth History - Previous 6 months ³	1081	249	1328	1769	-3419	204							F. Forecast - Next 12 months ⁴	202	202	202	1202	202	202	202	202	202	202	202	202
	Month #1	Month #2	Month #3	Month #4	Month #5	Month #6	Month #7	Month #8	Month #9	Month #10	Month #11	Month #12																																							
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F. Forecast - Next 12 months ⁴	202	202	202	1202	202	202	202	202	202	202	202	202																																							

G. Average Monthly Forecast (Sum of months 1-6 (Part F above) divided by 6): **388.667**

H. Months
to
Exhaust⁵
=

Numbers Available for Assignment to
Customers(A)

Average Monthly Forecast(G)

Block Requested

1

Available Numbers

196960

Months To Exhaust

534.249

I.

Utilization⁶ Assigned Numbers(B) - Excluded Numbers(D) X 100 =
= **64.228**

Total Numbering Resources(C)-Excluded
Numbers(D)

Explanation: _____

¹A copy of this worksheet is required to be submitted to the Pooling Administrator when requesting additional numbering resources in a rate center. For auditing purposes, the applicant must retain a copy of this document.

²Quantity of numbers activated in the past 90 days is based on blocks and/or codes received from the administrator and shall be reported in increments of 1,000 or 10,000 TNs (e. g.: 2 blocks received=2,000 and 1 code received =10,000).

³Net change in TNs no longer available for assignment in each previous month, starting with the most distant month as Month #1, and Month #6 as the current month.

⁴Forecast of TNs needed in each following month, starting with the most recent month as Month #1.



⁵To be assigned an additional thousands-block (NXX-X) for growth, "Months to Exhaust" must be less than or equal to 6 months. (FCC 00-104, section 52.15 (g) (3) (iii)).

⁶Newly acquired numbers may be excluded from the Utilization calculation (FCC 00104, section 52.15 (g) (3)(ii))

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Pooling Administration System	
 MARTA.ANTELO@ATT.COM (SP) • Sign Out	
Time : 01/18/2012 11:08:54 AM EST	
	Months to Exhaust and Utilization Certification Worksheet - TN Level(Continued)¹
	Your Utilization calculates to 64.228% . The FCC required the utilization of 75.000% . You have requested more blocks than you will exhaust in six months.
	Select One Option and Submit
	<p><input checked="" type="radio"/> Return to the Months To Exhaust Form</p> <p><input type="radio"/> Need to request a State Waiver</p> <p><input type="radio"/> Received a State Waiver</p>
	<div style="text-align: right;"><input type="button" value="Submit"/> <input type="button" value="Cancel"/></div>
<div> <div>Question? Email us © 1997-2012 Neustar, Inc. Legal Notice</div></div>	

STATE OF SOUTH CAROLINA

)

CERTIFICATE OF SERVICE

COUNTY OF RICHLAND

)

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for SBC Internet Services, Inc. d/b/a AT&T Internet Services ("ATTIS") and that she has caused AT&T South Carolina's Petition for Review of Numbering Resources Determination in the Columbia Rate Center to be served by the method indicated below upon the following this February 13, 2012:

Thomas C. Foley
Sr. NPA Relief Planner – Eastern Region NANPA
NeuStar – NANPA
820 Riverbend Blvd.
Longwood, FL 32779-2327
(Electronic Mail)

Ms. Kimberly Miller
Regulatory Policy Attorney
NeuStar-NANPA
2000 M Street, NW, Suite 600
Washington, DC 20036-3328
(Electronic Mail)

Wayne Milby
Sr. NPA Relief Planner
NueStar-NANPA
8385 Yahley Mill Rd.
Richmond, VA 23231
(Electronic Mail)

Mr. John Manning
Director
NANPA Regional Offices
46000 Center Oak Plaza
Sterling, VA 20166
(Electronic Mail)

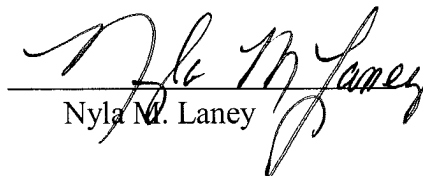
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